

EXHIBIT 21

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON)
TALCUM POWDER PRODUCTS)MDL NO.
MARKETING, SALES PRACTICES AND)16-2738 MAS RLS
PRODUCTS LIABILITY LITIGATION)
_____)

DEPOSITION OF MICHELE L. COTE, PH.D., M.P.H.

The deposition upon oral examination of
MICHELE L. COTE, PH.D., M.P.H., a witness produced
and sworn before Wendi Kramer Sulkoske, Notary Public
in and for the County of Boone, State of Indiana,
taken on behalf of the Defendant at Faegre Drinker
Biddle & Reath, 300 North Meridian Street, Suite
2500, Indianapolis, Marion County, Indiana on March
21, 2024, pursuant to the Applicable Rules of
Procedure.

1 A No, not that I'm aware of.

2 Q You are not an oncologist, correct?

3 A Correct. I am not an oncologist.

4 Q You are not a cell biologist or cancer biologist,
5 correct?

6 A I am not trained in cancer biology, no. But I
7 spent about twenty years in the cancer biology, it
8 was not a department, but we were a training
9 faculty for cancer biology students.

10 So I do feel like I have a good, but perhaps
11 not expert grasp of cancer biology.

12 Q And we talked earlier today about the in vitro
13 studies, correct?

14 A Correct.

15 Q And your testimony on that from this morning
16 remains?

17 A Correct. I do not do in vitro work in my own
18 laboratory.

19 Q Do you agree that prior to offering an expert
20 opinion on a particular topic that an expert
21 should be expected to conduct a comprehensive
22 review of the evidence on that topic?

23 MS. PARFITT: Objection. Form.

24 A Can you restate that question?

25 Q Sure. As a scientist like yourself,

1 methodologically before offering an opinion on a
2 specific topic, do you agree that you should do a
3 comprehensive review of the medical and scientific
4 literature on that topic?

5 A I agree that a comprehensive review should be
6 undertaken before entering an opinion, yes.

7 Q For purposes of the report and your opinions in
8 this litigation, did you do a comprehensive review
9 for medical and scientific evidence on the alleged
10 presence of heavy metals in talc powders?

11 A I did not do a systematic review of heavy metal in
12 talc powder.

13 Q And related to that, did you do a systematic or a
14 comprehensive review on the alleged
15 carcinogenicity of heavy metals in talcum powders?

16 A No, I did not do a systematic review.

17 Q Did you do a comprehensive review on the alleged
18 relationship between heavy metals and ovarian
19 cancer?

20 A No, I did not do a comprehensive systematic review
21 regarding heavy metals and ovarian cancer.

22 Q Did you do a comprehensive review for medical or
23 scientific evidence on the alleged presence or
24 carcinogenicity of chemicals in talcum powder
25 fragrances?

1 A No, I did not do a comprehensive review on
2 fragrances or heavy metals.

3 Q Did you do a comprehensive review of the medical
4 and scientific literature on the alleged presence
5 of asbestos and related elements in talcum
6 powders?

7 MS. PARFITT: Objection.

8 A I did not do a review specifically of asbestos. I
9 certainly reviewed comprehensive reports by, for
10 example, IARC that included asbestos as their main
11 exposure of interest.

12 Q Just to be more precise, did you do a
13 comprehensive review of evidence related to the
14 alleged presence of asbestos in talcum powders?

15 A No, I did not do a comprehensive systematic
16 review.

17 Q Did you do a comprehensive review of the alleged
18 presence of fibrous talc in talcum powders?

19 MS. PARFITT: Objection.

20 A Again, I read a lot of literature about fibrous
21 talc. But I did not do a comprehensive systematic
22 review like I did for the epidemiologic studies.

23 Q And for the epidemiologic studies on talc and
24 ovarian cancer, correct?

25 A Yes. It was talc as a whole. It was not the

1 components. It was whatever was in the bottles or
2 containers of talc that the women were using.

3 Q Did you do a comprehensive review of the actual
4 underlying articles on the alleged association or
5 relationship between asbestos and ovarian cancer?

6 MS. PARFITT: Objection. Form.

7 A No, I did not do my own individual review of the
8 articles going back to the literature.

9 For example, like what was cited in IARC, for
10 example, I did not do that.

11 Q I understand from your report you looked at IARC
12 2012, correct?

13 A There were two others as well.

14 Q Understood. For purposes of asbestos you are
15 referring to having reviewed IARC 2012, is that
16 right?

17 MS. PARFITT: Objection. Objection.

18 MR. JAMES: I will just withdraw the
19 question.

20 Q Before being retained in the litigation what was
21 your opinion on the relationship between talc and
22 ovarian cancer?

23 A Before being retained? So based on the paper that
24 we published in 2016, which I, myself, at that
25 time did not perform a systematic review, but it